

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a ) Case No. 16-cv-1054 (WMW/DTS)  
Delaware corporation, )  
)   
Plaintiff, )   
)   
v. ) **Jury Trial Demanded**  
)   
FEDERAL INSURANCE COMPANY, )   
an Indiana corporation, )   
)   
Defendant. )   
)

**DECLARATION OF MICHAEL ERBELE IN SUPPORT  
OF FAIR ISAAC CORPORATION’S MOTION TO COMPEL**

I, Michael Erbele, declare as follows:

1. I am an attorney with the law firm of Merchant & Gould P.C. I am one of the attorneys of record for the plaintiff, Fair Isaac Corporation, in the above-captioned matter.

2. I make this declaration on my own information, knowledge, and belief in support of Fair Isaac Corporation's Motion to Compel.

3. Attached hereto as Exhibit 1 is a true and correct excerpt of The Chubb Corporation's Form 10-K filed with the United States Securities and Exchange Commission for the fiscal year ending December 31, 2014.

4. Attached hereto as Exhibit 2 is a true and correct copy of a Bates numbered document FED000255\_0001-0034 titled “Rules and Process Management for Insurers” dated October 30, 2008. (FILED UNDER SEAL)

5. Attached hereto as Exhibit 3 is a true and correct copy of Federal Insurance Company's Supplemental Answers to Plaintiff's First Set of Interrogatories dated June 15, 2017.

6. Attached hereto as Exhibit 4 is a true and correct copy of Federal Insurance Company's Response to Plaintiff's First Set of Requests for Production of Documents dated May 11, 2017.

7. Attached hereto as Exhibit 5 is a true and correct copy of Federal Insurance Company's Answers to Plaintiff's First Set of Interrogatories dated May 11, 2017.

8. Attached hereto as Exhibit 6 is a true and correct copy of a Bates numbered document FICO0005919-5920, "Insurance Underwriting – What is the cost of not being a cognitive business?" by Mark Popolano, dated March 9, 2017.

9. Attached hereto as Exhibit 7 is a true and correct copy of a Bates numbered document FED001320\_0001-0028 titled "CICC IT Organization." (FILED UNDER SEAL)

10. Attached hereto as Exhibit 8 is a true and correct copy of a Bates numbered document FED001314\_0001-0021 titled "Systems Strategy." (FILED UNDER SEAL)

11. Attached hereto as Exhibit 9 is a true and correct copy of a Bates numbered document FED000270\_0001-0065 titled "An Introduction to Business Rules" dated October, 2009. (FILED UNDER SEAL)

12. Attached hereto as Exhibit 10 is a true and correct copy of a Bates numbered document FICO0005315-5317 titled "Repeatable Solution: Insurance Underwriting." (FILED UNDER SEAL)

13. Attached hereto as Exhibit 11 is a true and correct copy of a Bates numbered document FED000190\_0001-0009 titled “Enhancing BPM with Business Rules.” (FILED UNDER SEAL)

14. Attached hereto as Exhibit 12 is a true and correct copy of a Bates numbered document FICO0005292-5305 titled “The Value of Embedding the FICO Blaze Advisor Decision Rules Management System.” (FILED UNDER SEAL)

15. Attached hereto as Exhibit 13 is a true and correct copy of a Bates numbered document FED000141\_0001-0004, Gartner Report titled “Real-Time Decision-Making Applications Can Increase Revenue and Reduce Costs in the Contact Center.” (FILED UNDER SEAL)

16. Attached hereto as Exhibit 14 is a true and correct copy of a letter from Lora M. Friedemann to Heather Kliebenstein dated October 3, 2017.

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: January 29, 2018

s/Michael Erbele  
Michael Erbele